

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JANE DOE, individually, and as mother and next best)	
friend of JOHN DOE, a minor,)	
)	
Plaintiff,)	
)	
v.)	Case No. 10 C 11426-DJC
)	
)	Honorable Judge Casper
CULTURAL CARE, INC., a Massachusetts corporation,)	
d/b/a CULTURAL CARE AU PAIR, DORTE STROBEL,)	
and MAUREEN McDONNELL,)	
)	
Defendants.)	

**JOINT MOTION TO STAY ALL DEADLINES UNTIL COURT RULES ON
DEFENDANTS' PENDING MOTION FOR SUMMARY JUDGMENT**

Defendants Cultural Care, Inc., Dorte Strobel, and Maureen McDonnell (collectively, the “Defendants”) together with Plaintiff Jane Doe, individually, and as mother and next best friend of John Doe, a minor (the “Plaintiff”) (collectively, the “Parties”), by and through their counsel, hereby jointly request that this Court stay all deadlines in this case pending the Court’s ruling on the Defendants’ Motion for Summary Judgment and schedule a conference once it issues a ruling for purposes of selecting a new trial date and related deadlines.

In further support of their motion, the Parties state as follows:

1. The Plaintiff filed suit against the Defendants on or about October 1, 2009 in the United States District Court for the Northern District of Illinois Eastern Division. The case was transferred to this Court on or about August 19, 2010.
2. On July 14, 2011, the Defendants filed their Motion for Summary Judgment on All Remaining Counts of Plaintiff’s Amended Complaint at Law. On August 5, 2011, the Plaintiff filed her Memorandum in Opposition to Defendants’ Motion for Summary Judgment.

3. On August 10, 2011, the Parties appeared before this Court through counsel and presented oral argument on the Motion for Summary Judgment and Opposition. The Court took the motion under advisement.

4. At the present time, no decision has been issued on the Defendants' Motion for Summary Judgment.

5. Upon joint request of counsel, this Court issued an order on September 22, 2011 that, among other things, ordered that motions in limine be filed by October 10, 2011 and oppositions thereto, any proposed voir dire, and proposed jury instructions be filed by October 17, 2011. The Court left the following dates undisturbed, which were set prior:

Response to Jury Inst. Filed	October 27, 2011
Final Pretrial Conference	October 27, 2011
Trial	October 31, 2011

6. The Parties respectfully request that this Court stay all deadlines in this case pending the Court's ruling on the Defendants' Motion for Summary Judgment and schedule a conference thereafter for purposes of selecting a new trial date and related deadlines. The Parties require such relief because, in the absence of a ruling on the Defendants' Motion for Summary Judgment, they have no way of knowing the issues to be tried or what witness will need to be called and are therefore unable to draft motions in limine, voir dire, jury instructions, or otherwise prepare for trial. A stay of the deadlines in this case will also promote judicial economy because neither motions in limine, voir dire, jury instructions, nor a trial may be necessary if this matter is resolved via summary judgment. It will also allow the Court additional time to issue its ruling.

7. No party will be prejudiced by the allowance of this Motion.

WHEREFORE, the Parties hereby jointly request that this Court stay all deadlines in this case pending the Court's ruling on the Defendants' Motion for Summary Judgment and schedule a conference thereafter for purposes of selecting a new trial date and related deadlines.

Respectfully submitted,
Plaintiff,

Respectfully Submitted,
CULTURAL CARE, INC., MAUREEN
MCDONNELL, and DORTE STROBEL
By their counsel,

/s/ Paul W. Ryan
One of her attorneys
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CERTIFICATE OF SERVICE

I, Paul W. Ryan, attorney for the Plaintiff, hereby certify that a true and accurate copy of the foregoing Joint Motion to Stay All Deadlines Until Court Rules on Defendants' Pending Motion for Summary Judgment filed through the Electronic Case Filing System will be sent electronically to the registered participants on October 6, 2011.

Paul W. Ryan, Esq.